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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

SEALED

In the Matter of a

Case No. 3:21-mj-00164

Criminal Complaint

**MOTION TO SEAL CRIMINAL
COMPLAINT & RELATED
MATERIALS**

UNDER SEAL

The United States of America moves the Court for an order sealing the criminal complaint, the supporting affidavit, and this motion, and the resulting order because, disclosure of these documents at this time may result in the endangerment of the life or physical safety of an individual, flight from prosecution, the destruction of or tampering with evidence, intimidation of potential witnesses, and/or otherwise seriously jeopardize an investigation.

WHEREFORE, the government requests that this motion, the order, and criminal complaint and related materials referenced herein, be filed under seal, except for a copy to the Affiant and investigating agency for their investigative needs.

The government further requests that the government be authorized to provide copies of the criminal complaint, the supporting affidavit and any further pleadings to attorneys for any defendants in this case as part of its discovery obligations.

Dated: August 28, 2021.

Respectfully submitted,

SCOTT ERIK ASPHAUG
Acting United States Attorney

/s/ Peter D. Sax
PETER D. SAX
Assistant United States Attorney